

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: Equifax Inc. Customer
Data Security Breach Litigation

MDL Docket No. 2800
No. 1:17-md-2800-TWT

ALL ACTIONS

Chief Judge Thomas W. Thrash, Jr.

AMENDED JOINT PRELIMINARY REPORT AND DISCOVERY PLAN

Pursuant to Federal Rule of Civil Procedure 26, Local Rule 16.2, and Case Management Order No. 2 (ECF No. 87), the parties submit this Amended Joint Preliminary Report and Discovery Plan as follows.

Following the preliminary approval of the settlement of the Consumer Track case, the Plaintiffs in the Financial Institution Track and Defendants agree that certain modifications of the discovery schedule are necessary to allow the parties sufficient time to complete discovery as to the Financial Institution Track claims. Accordingly, the parties request that the Court enter the following amended deadlines:

Event	Existing Deadline	Amended Deadline
Parties Serve Responses and Objections to RFPs and Begin Document Production	Wednesday, February 27, 2019	Complete
Beginning of Fact Discovery	Friday, March 29, 2019	Complete
Add Additional Parties and/or Amend Pleadings	Monday, July 29, 2019	Complete

Event	Existing Deadline	Amended Deadline
Substantial Completion of Document Production	Monday, September 30, 2019	Monday, February 24, 2020
Fact Discovery Closes	Monday, December 30, 2019	Friday May 22, 2020
Disclosure of Plaintiffs' Expert(s) and Serve Expert Report(s)	Wednesday, January 29, 2020	Friday, June 12, 2020
Disclosure of Equifax's Expert(s) and Serve Expert Report(s)	Friday, February 28, 2020	Friday, July 10, 2020
Disclosure of Plaintiffs' Rebuttal Expert(s) and Serve Rebuttal Expert Report(s)	Friday, March 20, 2020	Friday, August 7, 2020
Completion of Expert Discovery	Tuesday, May 19, 2020	Friday, September 18, 2020
Local Rule 16.3 Conference	Tuesday, June 2, 2020	Monday, October 26, 2020
Plaintiffs' Class Certification Motions to Be Filed in Consumer Track	Tuesday, July 14, 2020	Removed
Plaintiffs' Class Certification Motions to Be Filed in Financial Institutions Track	Tuesday, July 28, 2020	Friday, October 16, 2020
Oppositions to Plaintiffs' Class Certification Motions to Be Filed in Consumer Track	Friday, August 28, 2020	Removed
Oppositions to Plaintiffs' Class Certification Motions to Be Filed in Financial Institutions Track	Friday, September 11, 2020	Wednesday, November 18, 2020

Event	Existing Deadline	Amended Deadline
Replies in Support of Plaintiffs' Class Certification Motions to Be Filed in Consumer Track	Monday, September 28, 2020	Removed
Replies in Support of Plaintiffs' Class Certification Motions to Be Filed in Financial Institutions Track	Monday, October 12, 2020	Friday, December 18, 2020
Summary Judgment Motions to Be Filed in the Consumer Track	Tuesday, September 22, 2020	Removed
Summary Judgment Motions to Be Filed in the Financial Institutions Track	Tuesday, October 6, 2020	Friday, January 29, 2021
Opposition to Summary Judgment Motions to Be Filed in Consumer Track	Thursday, October 22, 2020	Removed
Opposition to Summary Judgment Motions to Be Filed in Financial Institutions Track	Thursday, November 5, 2020	Friday, March 5, 2021
Reply in Support of Summary Judgment Motions to Be Filed in the Consumer Track	Thursday, November 12, 2020	Removed
Reply in Support of Summary Judgment Motions to Be Filed in the Financial Institutions Track	Friday, November 27, 2020	Friday, March 26, 2021

Respectfully submitted,
September 12, 2019

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CERTIFICATION

The Undersigned hereby certifies, pursuant to Local Civil Rule 7.1D, that the foregoing document has been prepared with one of the font and point selections (Times New Roman, 14 point) approved by the Court in Local Civil Rule 5.1C.

This 12th day of September, 2019.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 12th day of September, 2019, the undersigned electronically filed the foregoing filing using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record in this case.

/s/ Joseph P. Guglielmo

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SCHEDULING ORDER

Upon review of the information contained in the Amended Joint Preliminary Report and Discovery Plan form completed and filed by the parties, the Court orders that the time limits for adding parties, amending the pleadings, filing motions, completing discovery, and discussing settlement are as set out in the Federal Rules of Civil Procedure and the Local Rules of this Court, except as herein modified

IT IS SO ORDERED.

Date: _____, 2019

Thomas W. Thrash
United States District Judge